

IN THE UNITED STATES DISTRICT COURT FILED BY WLE D.C.
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION 05 SEP -1 PM 5:10

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN MEADOWS

Defendant.

Criminal No. 04-20246-D

MOTION GRANTED

DATE: 9-1-2005

Bernice Bouie Donald
BERNICE BOUIE DONALD
U.S. DISTRICT JUDGE

**MOTION OF THE UNITED STATES FOR SENTENCING DEPARTURE PURSUANT
TO U.S.S.G. §5K1.1**

Comes now the United States of America, by and through the United States Attorney for the Western District of Tennessee and his duly authorized Assistant, David Pritchard, and would respectfully move this Honorable Court for a downward departure pursuant to §5K1.1 of the United States Sentencing Guidelines. The basis for the motion is as follows:

1. The Defendant testified as a Government witness in a trial involving violations of 18 U.S.C. 922(g), 924(c) and 21 U.S.C. 841(a)(1). Defendant testified that he was a witness to drug sales and weapons possession by the accused. Defendant also testified that he bought crack cocaine from the accused.
2. The defendant's assistance has been timely, truthful, complete and reliable.
3. The defendant's assistance has placed members of his family in danger.

The defendant has provided substantial assistance to law enforcement and both he and the cooperating witness have indicated a willingness to provide continued assistance.

This document entered on the docket sheet in compliance
with Rule 55 and/or 32(b) FRCP on 9/1/05

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WHEREFORE, counsel for the United States respectfully moves this Honorable Court to depart downward from the Sentencing Guidelines in sentencing the defendant.

Respectfully submitted,

TERRELL L. HARRIS
United States Attorney

By: _____




David Pritchard, BPR# 18187
Special Assistant United States Attorney
167 No. Main, Suite 800
Memphis, TN 38103

CERTIFICATE OF SERVICE

I, David Pritchard, Special Assistant United States Attorney, hereby certify that a copy of the foregoing motion has been forwarded to Ms. Mary Cay Jermann, Attorney for the Defendant.

This 1 day of September, 2005.



David Pritchard
Special Assistant United States Attorney



Notice of Distribution

This notice confirms a copy of the document docketed as number 46 in case 2:04-CR-20246 was distributed by fax, mail, or direct printing on September 8, 2005 to the parties listed.

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Honorable Bernice Donald
US DISTRICT COURT